

JOSEPH & KIRSCHENBAUM LLP

Attorneys at Law

Charles Joseph
D. Maimon Kirschenbaum
Denise Schulman
Josef Nussbaum
Lucas C. Buzzard
Michael DiGiulio
Leah M. Seliger

32 Broadway, Suite 601
New York, NY 10004
Phone (212) 688-5640
Fax (212) 688-2548
www.jk-llp.com

November 13, 2024

VIA ECF

Hon. Cathy Seibel
U.S. District Court for the Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and U.S. Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: Pamela Wimbish & Patricia Onken v. IBM
No.: 23-cv-8327

Dear Judge Seibel,

We represent Plaintiffs in the above-referenced matter. We write with Defendant's consent to respectfully request a one-week adjournment of Plaintiffs' November 15, 2024 deadline to file their motion to amend their complaint, and a corresponding one-week adjournment of Defendants' deadline to file their opposition. *See* ECF, Minute Entry 9/27/2024. This is Plaintiffs' first request for an adjournment of their deadline.

The reason for this is a family medical emergency on the part of the undersigned, which has required me to be out of the office for several days and likely the remainder of this week. Defendant has consented to this request, which will not affect the ultimate deadline of January 10, 2025 for the submission of Plaintiff's reply. If this request is granted, the parties revised briefing schedule would be:

- November 22, 2024 – Plaintiffs' motion due;
- December 23, 2024 – Defendant's opposition due;
- January 10, 2025 – Plaintiffs' reply due.

As suggested by Your Honor at the premotion conference held on September 25, 2024, the parties will be using the bundling approach for this motion by serving their respective briefs on one another and then filing the entire bundle on January 10, 2025.

We thank you for your attention to this matter.

Respectfully submitted,

/s/Lucas C. Buzzard
Lucas C. Buzzard